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June 29, 2005

VIA HAND DELIVERY

Mr. Charles L. A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Petition of MCImetro Access Transmission Services, LLC for Arbitration of Certain Terms and Conditions of Proposed Agreement with Farmers Telephone Cooperative, Inc., Home Telephone Company, Inc., PBT Telecom, Inc., and Hargray Telephone Company, Concerning Interconnection and Resale under the Telecommunications Act of 1996 Docket No. 2005-67-C

Dear Mr. Terreni:

I am writing on behalf of Farmers Telephone Cooperative, Inc., Home Telephone Company, Inc., PBT Telcom, Inc., and Hargray Telephone Company (the "RLECs") to respectfully request that the Commission deny the Petition for Rehearing or Reconsideration of Order No. 2005-233 that was filed by Time Warner Cable Information Services (South Carolina), LLC ("TWCIS") in the above-referenced matter.

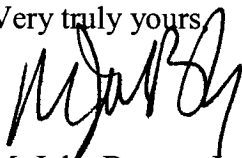
TWCIS' Petition for Rehearing or Reconsideration simply reiterates the arguments it made in its Petition to Intervene. By way of response, we incorporate our earlier letter response dated April 27, 2005, which is attached hereto. The Commission has already fully considered these arguments and, by its Order No. 2005-233, appropriately denied TWCIS' request to intervene in this matter, which involves the arbitration of contracts between the individual RLECs and MCImetro Access Transmission Services, LLC.

Please clock in a copy of this letter and return it with our courier.

Charles L.A. Terreni
June 29, 2005
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Thank you for your assistance.

Very truly yours,



M. John Bowen, Jr.

MJB/rwm
Attachments

cc: Parties of Record
Frank R. Ellerbe, III

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April 27, 2005

VIA HAND DELIVERY

Mr. Charles L. A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Petition of MCImetro Access Transmission Services, LLC for Arbitration of Certain Terms and Conditions of Proposed Agreement with Farmers Telephone Cooperative, Inc., Home Telephone Company, Inc., PBT Telecom, Inc., and Hargray Telephone Company, Concerning Interconnection and Resale under the Telecommunications Act of 1996 Docket No. 2005-67-C

Dear Mr. Terreni:

I am writing to express the opposition of Farmers Telephone Cooperative, Inc., Home Telephone Company, Inc., PBT Telecom, Inc., and Hargray Telephone Company (the "RLECs") to the Petition to Intervene filed in the above-referenced matter by Time Warner Cable Information Services, LLC ("TWCIS"). We respectfully request that the Public Service Commission of South Carolina ("Commission") deny TWCIS' request to intervene in this arbitration proceeding between MCImetro Access Transmission Services, LLC ("MCI") and the individual RLECs, for the reasons stated herein.

Arbitration proceedings, pursuant to Sections 252 of the Telecommunications Act of 1996 (the "Act"), are not like the typical contested cases that the Commission presides over pursuant to the South Carolina Administrative Procedures Act. Instead, arbitration proceedings are a method used by two parties who have been unable to come to an agreement through negotiation. Arbitration proceedings are conducted by the Commission to assist the parties in resolving the differences they have identified through the negotiation process in order to reach a final agreement between the parties. In other words, they are the culmination of the negotiation process contemplated under Sections 251 and 252 of the Act. Arbitration proceedings relate to a particular agreement and to the particular parties to that agreement. The fact that a third party may be interested in the issues or even, as TWCIS asserts, be interested in the final agreement itself, does not mean that those third parties should be

Charles L.A. Terreni
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permitted to participate in an arbitration proceeding. It is simply not appropriate for any person or entity that is not a party to the agreement and, therefore, did not participate in the negotiations, to participate as a party to the arbitration proceeding. The negotiation process has taken place without TWCIS' involvement and it would not be appropriate to interject TWCIS into the middle of the process now.

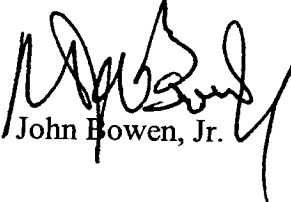
The Commission has previously denied a Petition to Intervene filed by the Consumer Advocate in an arbitration proceeding. See Commission Order No. 96-715 in Docket No. 96-262-C (BellSouth/ACSI Arbitration). Due to the Consumer Advocate's unique statutory role, the Commission did permit the Consumer Advocate to observe the proceedings, submit non-binding questions to the Arbitrator, and make opening and closing statements in the proceeding. However, the Commission expressly denied the Consumer Advocate's request to be granted intervenor status as a party of record. The basis for TWCIS' request to intervene in the instant arbitration is even more tenuous. TWCIS has no statutory role to fulfill, but is merely a potential future customer of MCI in the service areas of the RLECs with whom MCI is seeking interconnection agreements. Therefore, TWCIS should not be permitted even to play a limited role in the resolution of this matter. While TWCIS asserts that its intervention is "necessary to protect its interests in this matter," it is not a party to the agreements between MCI and the individual RLECs. If the Commission were to grant TWCIS' intervention in this matter, any customer or potential customer of any carrier that is the subject of a future arbitration proceeding could argue that it likewise has an interest in the outcome of that proceeding. As the Commission has previously recognized, the purpose of an arbitration proceeding is to resolve specific disputed issues between two parties to an agreement, not to provide a public forum for the discussion of those issues.

For the reasons discussed herein, we respectfully request that the Commission deny the Petition to Intervene filed by TWCIS in this arbitration proceeding between MCI and the RLECs.

Please clock in a copy of this letter and return it with our courier.

Thank you for your assistance.

Very truly yours,


M. John Bowen, Jr.

cc: Parties of Record
Frank R. Ellerbe, III